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TMIA 10/1/84

RELATED CORRESPONDENCE

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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'84 OCT -4 A10:38

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

|                             |   |                            |
|-----------------------------|---|----------------------------|
| In the Matter of            | ) |                            |
|                             | ) |                            |
| METROPOLITAN EDISON COMPANY | ) | Docket No. 50-289 SP       |
|                             | ) | (Restart-Management Phase) |
| (Three Mile Island Nuclear  | ) |                            |
| Station, Unit No. 1)        | ) |                            |
|                             | ) |                            |

THREE MILE ISLAND ALERT'S SECOND SUPPLEMENTAL RESPONSE  
TO LICENSEE'S FIRST SET OF INTERROGATORIES AND FIRST  
REQUEST FOR PRODUCTION (TRAINING)

Interrogatory No. T-6

(1) GPU needs to determine the root cause for the cheating incidents.

(2) GPU has failed to accept any blame for the cheating incidents and instead lays all blame for the incidents on the individual operators.

GPU must accept responsibility at the corporate and management level in order to avoid the problems in the future and root out the basic causes.

See generally Frederick, Newton, and Reconstituted OARP responses to TMIA's interrogatories. Licensee's Answer to TMIA's Second Set of Interrogatories, Response to Interrogatory 6 at 12-14; Interrogatory 7 at 15-16; and Interrogatory 47 at 75.

(3) Management must provide adequate support to the training program. See Document 2I-27(39), Memo to Arnold from Knief, September 1, 1982.

Interrogatory Nos. T-22 and T-23

(1) See attitude problems described in RHR Report. See  
8410050005 841001  
PDR ADOCK 05000289  
G PDR

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TMIA Response to Licensee's First Set of Interrogatories,  
Interrogatory T-25.

(2) Off-shift reports produced in discovery outline the following attitude problems:

(a) 2D-27(403) - Off-Shift Report by Bruce Leonard:

(i) GPU has no standard response to emergency situations and Auxiliary Operator standard emergency responses have not been accepted by operators;

(ii) Operators do not understand that shift supervisors and shift foremen need to know where they are at all times.

(b) Off-shift Tour Report by Newton, January 15, 1982:

There is little or no attempt of supervisors to work with operators on OJT.

(3) Employees lack confidence in the training process as well as in various levels of GPU and management. They also lack confidence in plant procedures, administrative guidelines, and corporate policies. See Memo to Arnold from Long, August 30, 1982, Re Lessons Learned from ASLB PID.

(4) Operators fail to appreciate the significance of documentation problems and their potential safety significance.

Interrogatory No. 24(c)

GPU has failed to determine the root cause or accept corporate responsibility for the cheating failures.

Dr. Long, D. A. Ross and R. A. Knief, who have positions of responsibility with respect to the TMI Training Program, have failed to recognize the following as issues deserving management attention:

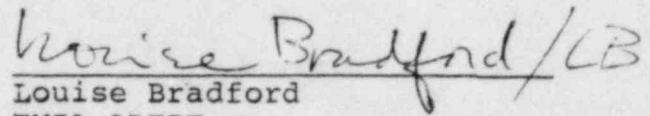
(1) The need to demonstrate concern/willingness to help employees;

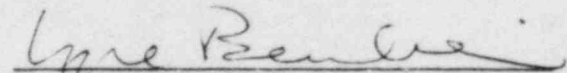
(2) The need for GPUN to develop standards and guides for site training programs;

(3) The need for strengthening of site stress control/assistance program. See 2I-27(36), TNE Department Head Reviews of ASLB PID (October 1982), 2I-27(40), Memo to Arnold and Clark from P. Gaines, August 31, 1982.

TMIA will supplement this response after an adequate time to review the documents provided by licensee. Because of the inability of licensee to copy most of the documents requested by Ms. Bradford in a timely fashion, she was unable to supplement interrogatory answers by reference to those documents.

Respectfully submitted,

  
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